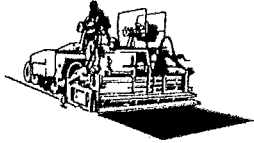


**Coeur d'Alene**  
**PAVING**  
INCORPORATED  
E. 120 Anton Ave.  
Coeur d'Alene, ID 83815  
Tel: 208.762.0235 Fax: 208.665.9236



June 18, 2008

Darrin Pampaian, Permit Writer  
Idaho Department of Environmental Quality  
Air Quality Division  
1410 North Hilton  
Boise, Idaho 83706

RECEIVED  
JUN 20 2008  
Department of Environmental Quality  
State Air Program

RE: Facility ID No. 777-00432, Coeur d'Alene Paving, Inc., Rathdrum Plant 15 Day Permit to Construct

Dear Mr. Pampaian;

Coeur d'Alene Paving, Inc. (Cd'A Paving) is requesting the ability to construct before the required permit to construct. Cd'A Paving is applying as a minor source without emissions netting or emission offsets. See Section II.3 for Facility Emission Inventory and Potential to Emit.

We have spent a great deal of additional time and expense due to extra modeling for the temporary crusher that has a Permit By Rule and there were corrections that had to be made to the spreadsheets made available to our Environmental Engineer. We request that this permit application be considered a priority due to the delays.

All requirements of the 15-Day Pre-Permit Construction Approval Completeness Checklist have been met prior to this application submittal.

Should you have any questions, do not hesitate to contact me at (208) 762-0235 or [phillw@cdapaving.com](mailto:phillw@cdapaving.com).

Regards,

A handwritten signature in cursive script, appearing to read "Phill Weist".

Phill Weist  
Coeur d'Alene Paving, Inc.  
E. 120 Anton Ave.  
Coeur d'Alene, Idaho 83815



**Department of Environmental Quality**  
1410 N. Hilton, Boise, ID 83706  
For assistance, call the  
Air Permit Hotline - 1-877-5PERMIT

AQ-CH-P004  
Rev: 3  
1/25/08

## **15- Day Pre-Permit Construction Approval Application Completeness Checklist**

This checklist is designed to aid the applicant in submitting a complete pre-permit construction approval application.

### **I. Actions Needed Before Submitting Application**

- ☒ Refer to the Rule. Read the Pre-Permit Construction requirements contained in IDAPA 58.01.01.213, Rules for the Control of Air Pollution in Idaho.
- ☒ Refer to DEQ's Pre-Permit Construction Approval Guidance Document. DEQ has developed a guidance document to aid applicants in submitting a complete pre-permit construction approval application. The guidance document is located on DEQ's website (go to [http://www.deq.idaho.gov/air/permits\\_forms/permitting/ptc\\_prepermit\\_guidance.pdf](http://www.deq.idaho.gov/air/permits_forms/permitting/ptc_prepermit_guidance.pdf))
- ☒ Consult with DEQ Representatives. Schedule a meeting with DEQ to discuss application requirements before submitting the pre-permit construction approval application. The meeting can be in person or on the phone. Contact DEQ's Air Quality Permit Coordinator at (208) 373-0502 to schedule the meeting. Refer to IDAPA 58.01.01.213.01b.
- ☒ Schedule Informational Meeting. Schedule an informational meeting before submitting the pre-permit construction approval application for the purposes of satisfying IDAPA 58.01.01.213.02.a. The purpose for the informational meeting is to provide information about the proposed project to the general public. Refer to IDAPA 58.01.01.213.01.c.
- ☒ Submit Ambient Air Quality Modeling Protocol. It is required that an ambient air quality modeling protocol be submitted to DEQ at least two (2) weeks before the pre-permit construction approval application is submitted. Contact DEQ's Air Quality Modeling Coordinator at (208) 373-0502 for information about the protocol.
- ☒ Written DEQ Approved Protocol. Written DEQ approval of the modeling protocol must be received before the pre-permit construction approval application is submitted. Refer to IDAPA 58.01.01.213.01.c.

### **II. Application Content**

**Application content should be prepared using the checklist below. The checklist is based on the requirements contained in IDAPA 58.01.01.213 and DEQ's Pre-Permit Construction Approval Guidance Document.**

- ☒ Pre-Permit Construction Eligibility and Proof of Eligibility. Pre-permit construction approval is available for minor sources and for minor modifications only. Emissions netting and emissions offsets are not allowed to be used. A certified proof of pre-permit construction eligibility must be submitted with the pre-permit construction approval application. Refer to IDAPA 58.01.01.213.01.
- ☒ Request to Construct Before Obtaining a Permit to Construct. A letter requesting the ability to construct before obtaining the required permit to construct must be submitted with the pre-permit construction approval application. Refer to IDAPA 58.01.01.213.01.c.
- ☒ Apply for a Permit to Construct. Submit a Permit to Construct application using forms available on DEQ's website at [http://www.deq.idaho.gov/air/permits\\_forms/forms/ptc\\_general\\_application.pdf](http://www.deq.idaho.gov/air/permits_forms/forms/ptc_general_application.pdf). Refer to IDAPA 58.01.01.213.01.a.
- ☒ Permit to Construct Application Fee. The permit to construct application fee must be submitted at the time the original pre-permit construction approval application is submitted. Refer to IDAPA 58.01.01.224.



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- ☒ Notice of Informational Meeting. Within ten (10) days after the submittal of the pre-permit construction approval application, an information meeting must be held in at least one location in the region where the stationary source will be located. The information meeting must be made known by notice published at least ten (10) days before the information meeting in a newspaper of general circulation in the county in which the stationary source will be located. A copy of this notice, as published, must be submitted with the pre-permit construction approval application. Refer to IDAPA 58.01.01.213.02.a.
- ☒ Process Description(s). The process or processes for which pre-permit construction approval is requested must be described in sufficient detail and clarity such that a member of the general public not familiar with air quality can clearly understand the proposed project. A process flow diagram is required for each process for which pre-permit construction approval is requested. Refer to IDAPA 58.01.01.213.01.c.
- ☒ Equipment List. All equipment that will be used for which pre-permit construction approval is requested must be described in detail. Such description includes, but is not limited to, manufacturer, model number or other descriptor, serial number, maximum process rate, proposed process rate, maximum heat input capacity, stack height, stack diameter, stack gas flowrate, stack gas temperature, etc. All equipment that will be used for which pre-permit construction approval is requested must be clearly labeled on the process flow diagram. Refer to IDAPA 58.01.01.213.01.c.
- ☒ Scaled Plot Plan. It is recommended that a scaled plot plan be included in the pre-permit construction approval application and must clearly label the location of each proposed process and the equipment that will be used in the process.
- ☒ Proposed Emissions Limits and Modeled Ambient Concentration for All Regulated Air Pollutants. All proposed emission limits and modeled ambient concentrations for all regulated air pollutants must demonstrate compliance with all applicable air quality rules and regulations. Regulated air pollutants include criteria air pollutants (PM<sub>10</sub>, SO<sub>x</sub>, NO<sub>2</sub>, O<sub>3</sub>, CO, lead), toxic air pollutants listed pursuant to IDAPA 58.01.01.585 and 586, and hazardous air pollutants listed pursuant to Section 112 of the 1990 Clean Air Act Amendments (go to <http://www.epa.gov/ttn/atw/188polls.html>). Describe in detail how the proposed emissions limits and modeled ambient concentrations demonstrate compliance with each applicable air quality rule and regulation. It is requested that emissions calculations, assumptions, and documentation be submitted with sufficient detail so DEQ can verify the validity of the emissions estimates. Refer to IDAPA 58.01.01.213.01.c.
- ☒ Restrictions on a Source's Potential to Emit. Any proposed restriction on a source's potential to emit such that permitted emissions will be either below major source levels or below a significant increase must be described in detail in the pre-permit construction approval application. Refer to IDAPA 58.01.01.213.01.d.
- ☒ List all Applicable Air Quality Rules and Regulations. All applicable rules and regulations must be cited by the rule or regulation section/subpart that applies for each emissions unit. Refer to IDAPA 58.01.01.213.01.c.
- ☒ Certification of Pre-Permit Construction Approval Application. The pre-permit construction approval application must be signed by the Responsible Official and must contain a certification signed by the Responsible Official. The certification must state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Refer to IDAPA 58.01.01.213.01.d and IDAPA 58.01.01.123.
- ☒ Submit the Pre-Construction Approval Application. Submit the pre-permit construction approval application to the following address:

Department of Environmental Quality  
Air Quality Division  
Stationary Source Program  
1410 North Hilton  
Boise, ID 83706-1255

## **SECTION I.1**

**Refer to the Rule  
(Done)**

## **SECTION 1.2**

**Refer to DEQ's Pre-Permit Construction Approval Guidance Document  
(Done)**

## **SECTION I.3**

**Consult with DEQ Representatives  
(Done)**

**Consult with DEQ Representatives**

**Completed June 17, 2008**

**Attendees via Conference call:**

**Darrin Pampian, DEQ**

**Marie Piper, Cascade Environmental**

**Phill Weist, Coeur d'Alene Paving**

**Craig Cozad, Coeur d'Alene Paving**

## **SECTION I.4**

**Schedule Informational Meeting  
(Done)**



# AFFIDAVIT OF PUBLICATION

STATE OF IDAHO,  
County of Kootenai,

} ss.

*Molly Stem*

being first duly sworn

upon oath deposes and says:

1. I am now and at all times hereinafter mentioned was a citizen of the United States, resident of the State of Idaho, over the age of twenty-one years and not a party of the above entitled action.

2. I am now and at all times hereinafter mentioned was the printer (principal clerk) of the "Coeur d'Alene Press," a newspaper printed and published daily except Sunday in Coeur d'Alene, Kootenai County, Idaho, and having a general circulation in said county.

3. The

*legal notice*

of which the annexed is a printed copy, was published in the regular issue of said newspaper for *Thursday* consecutive *weeks* commencing on the *24* day of *May*, 20*08*, and ending on the *5* day of *June*, 20*08*, and such publication was made as often during said period as said newspaper was regularly issued.

4. That said newspaper has been continuously and uninterruptedly published in said Kootenai County, during a period of more than seventy-eight consecutive weeks immediately prior to the first publication of said notice.

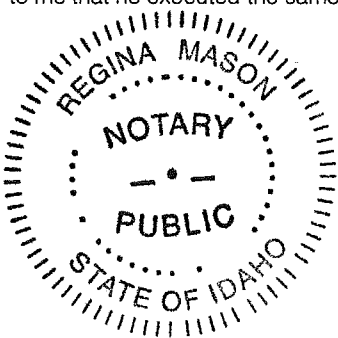
On this *5* day of *June* in the year of *2008*, before me, a Notary Public, personally appeared *Molly Stem*

known or identified to me to be the person whose name subscribed to the within instrument, and being by me first duly sworn, declared that the statements therein are true, and acknowledged to me that he executed the same.

*Regina Mason*

Notary Public for the State of Idaho,  
residing at Coeur d'Alene, Idaho.

MY COMMISSION EXPIRES 6/18/09



## NOTICE OF PUBLIC HEARING

FOR NEW ASPHALT PLANT- PLEASE TAKE NOTICE THAT Coeur d'Alene Paving, Inc. will conduct an informal hearing on June 5, 2008 at 5:00 p.m. at Rathdrum Lions Club, 16114 Meyer Road, Rathdrum, Idaho, the purpose of which is to discuss the new asphalt plant on 30 acres zoned mining near Rathdrum, Idaho. All citizens are invited to attend the public hearing and be heard on the new asphalt plant. The applicant is satisfying DEQ's requirement per IDAPA 58.01.01.213. Assistance for persons with disabilities will be provided upon 24 hour notice prior to the public hearing. Craig Cozad, President  
Legal 2845  
May 24, 29, 30, 31, 2008  
June 2, 3, 4, 5, 2008

## **SECTION 1.5**

**Previously Submitted  
Air Quality Modeling Protocol  
(Attached also)**

**Idaho Department of Environmental Quality**  
**Modeling Protocol Template**  
**For**  
**Coeur d'Alene Paving HMA Rathdrum Plant**

**1.0 PROJECT DESCRIPTION AND PURPOSE OF MODELING**

A brief description of the proposed project should be provided, with a focus on aspects pertaining to air pollution emissions and impacts. The following data and information should be provided:

- **Location of the facility, including a description of the general area where the facility is located and UTM coordinates.** The facility is proposed to be located at 2492 West Hwy 53 in Rathdrum, Idaho. The existing site is a gravel pit. An aerial photo of the project vicinity is provided as Appendix A. The UTM coordinate for the drum mixer baghouse is approximately 47° 48' 59" N and 116° 49' 01" W.
- **Type of permit applied for (PTC or Tier II Operating Permit)** Permit to Construct
- **Qualitative description of emissions associated with the proposed project and the entire facility.** The project will include a hot mix asphalt plant using a drum mixer and baghouse, conveyors, storage silo, hot oil tank, and load-out and material handling operations. Twice a year, a crusher will be brought onsite. The primary emissions include particulate matter from material handling and by-product emissions from natural gas combustion.

**2.0 DESCRIPTION OF EMISSIONS QUANTITIES**

The applicant should describe the types and quantities of emissions expected from the proposed project, although refined estimates of emissions quantities are not required for approval of the modeling protocol. The applicant should describe how estimated emissions are used in the model, including emissions calculations for specific averaging periods.

DEQ's HMA emission inventory spreadsheet is used to quantify emissions from the various project activities. Emissions include criteria pollutants and Toxic Air Pollutants (TAPs). Maximum 1-hour emission rates are used for all pollutants except carcinogenic TAPs where the annual average emission rates are used. The annual average emission rates are based on a maximum of 2,000 hours of operation each year.

**3.0 MODELING APPLICABILITY ASSESSMENT**

The applicant should describe the process used to determine what pollutants and specific sources will be included in the modeling analyses.

From discussions with DEQ, the following sources were requested to be modeled: drum mixer (with baghouse), conveyors, storage silo, hot oil tank, and load-out, crushing, and material handling operations. The primary criteria pollutants from combustion are particulate matter less than 10 micron in diameter, oxides of nitrogen, sulfur dioxide, and carbon monoxide. TAPs that exceed DEQ screening emission levels are benzene, formaldehyde, cadmium, hexavalent chromium, nickel, total PAHs, POM, and arsenic. These twelve pollutants are modeled for comparison with ambient standards.

### **3.1 Criteria Pollutant Modeling Applicability**

Modeling applicability thresholds, as specified in the *State of Idaho Air Modeling Guideline*, should generally be used to evaluate the need for air pollutant dispersion modeling. Although fugitive emissions are not considered in the evaluation of whether a permit is needed for a proposed project, fugitive emissions are typically included in the evaluation of whether modeling analyses are needed. If final emissions estimates are not yet available, the protocol should describe the process proposed to evaluate modeling applicability.

Emission inventory spreadsheets included on compact disk with modeling input and output files.

### **3.2 TAPs Modeling Applicability**

Dispersion modeling of TAPs emissions increases associated with the proposed project are required if total emissions increases exceed TAP-specific screening emissions levels (ELs). IDAPA 58.01.01.210, the *State of Idaho Air Quality Modeling Guideline*, and the DEQ *Toxic Air Pollutant (TAP) Preconstruction Compliance Application Completeness Checklist* should be used to evaluate TAPs modeling applicability.

Emission inventory spreadsheets included on compact disk with modeling input and output files.

## **4.0 MODELING ANALYSES METHODOLOGY**

### **4.1 Model Used**

The specific model used in the analyses should be described, including the model version number. Any graphical user interface (GUI) programs used for the model should also be described.

AERMOD with BEEST GUI version 9.73 as recommended by DEQ. Modeling input file from DEQ revised to include additional pollutants and facility-specific equipment locations and parameters.

### **4.2 Criteria Pollutant Modeling Methodology**

Permit compliance modeling typically involves Significant Impact Analyses and subsequent Full Impact Analyses, depending on the modeling results. The Significant Impact Analyses involve modeling all emissions increases associated with the proposed project. The protocol should thoroughly describe the sources and emissions assessed in the Significant Impact Analyses. A thorough justification should be provided if the applicant elects to exclude from the Significant Impact Analyses any new sources or increases in emissions from existing sources. All emissions sources should be included in Significant Impact Analyses for facility-wide Tier II Operating Permit applications.

Full Impact Analyses typically involve modeling of all emissions sources at the facility. Neighboring facilities that could substantially contribute to impacts should also be included in the Full Impact Analyses. The protocol should identify any nearby facilities that could potentially impact air quality in the same general area as the applicant's facility. If there are neighboring facilities, DEQ should be contacted to develop a method to consider impacts from such sources. The applicant should also describe the model design concentration that will be used to evaluate compliance. For example, the maximum 2<sup>nd</sup> high modeled concentration from each year of

meteorological data is typically used for evaluating compliance with the 24-hour SO<sub>2</sub> standard. The *State of Idaho Air Quality Modeling Guideline* or DEQ modeling staff should be consulted to determine the format of design concentrations.

A background concentration is added to Full Impact Analysis modeling results to account for other sources contributing to existing pollutant concentrations that are not explicitly modeled. DEQ modeling staff should be contacted to obtain appropriate background concentrations for the area where the facility is located.

Maximum impacts are at the boundary of the facility and modeling of other facilities was not determined to be necessary. DEQ will provide the background concentrations for those pollutants of concern.

#### **4.3 TAPs Modeling Methodology**

TAPs modeling is normally only required for new sources; TAPs analyses are not required for Tier II Operating Permits unless specifically identified by DEQ. Specific requirements outlined in IDAPA 58.01.01.210 and the DEQ *Toxic Air Pollutant (TAP) Preconstruction Compliance Application Completeness Checklist* must be followed to demonstrate compliance. The protocol should describe the method to be used to the extent possible.

Modeled TAP impact concentrations will be compared with DEQ's acceptable ambient concentrations for carcinogens (AACCs) to demonstrate compliance.

#### **5.0 MODEL INPUT DATA**

Data proposed for the modeling analyses should be described to the greatest degree possible. The protocol should also thoroughly justify and document the use of data as reasonably accurate, appropriate, and/or representative.

Source input data for the modeling is facility specific. Appendix B contains the plot and elevation plans for the HMA plant. The location of the HMA plant is fairly accurate as are the general locations of the material handling and crushing operations. For conservativeness, the emissions from material handling in the northeast corner of the property are calculated using low control emission factors. The material handling and the crushing operations nearer the center of the property are calculated using high control emission factors as water spray systems are in place for that area.

The modeling will incorporate several conservative assumptions, including:

- year-round meteorological data even though the facility operates predominantly in the summer
- two meteorological data sites
- low control for the northeast corner material handling operations for the entire year rather than taking credit for the wetter material (higher control) during the non-summer months
- placing the low control material handling operations in the corner closest to the property boundary and in the flow of the predominant wind direction to account for worst-case impacts
- crushing operations are quantified at 5 times the anticipated facility capacity as the crusher will be brought in by an outside company and they may bring a crusher as large as 750 tph

- having the crusher in the modeling analysis for the full year even though a maximum of 10 weeks per year is anticipated
- 24-hour per day operations even though it is anticipated the facility will operate less than 14 hours each day
- simultaneous operation of all emission sources

### **5.1 Meteorological Data**

The applicant must demonstrate that meteorological data used in the analyses are reasonably representative of the site. If the meteorological data proposed were not collected from the application site, the applicant should thoroughly describe how data from the meteorological monitoring site are reasonably representative of conditions at the application site. In most instances this would require assessment by someone with expertise in meteorology.

If the applicant is uncertain as to the representativeness of the data, DEQ modeling staff should be consulted prior to submission of the protocol. If representative meteorological data are not available, DEQ may require a buffer on modeled impacts to account for uncertainty associated with results obtained from the use of nonrepresentative data.

DEQ may provide appropriate model-ready meteorological data in some instances. The applicant should consult with DEQ to determine whether such data are available for the application site.

The applicant should work closely with DEQ modeling staff if AERMET must be run to generate AERMOD input data. Procedures for selecting surface characteristics are currently not well standardized, and agreement on establishing surface characteristics by land use type should be discussed prior to submission of the application.

DEQ provided five years of Spokane, WA and five years of Sandpoint, ID meteorological data for use in the modeling analyses. DEQ also provided the following guidance via e-mail:

The submitted modeling analyses should address impacts associated with operations at the initial location in Coeur d'Alene. DEQ will provide meteorological data for Spokane and Sandpoint. To demonstrate compliance, modeling analyses should be performed using both data sets, and the design concentration should be the maximum of 2<sup>nd</sup> high modeled concentrations at each receptor location when using the 5-year data set (not each year modeled separately).

When modeling TAPs, use the 5-year data set and compare the "period average" concentration to the AACCs. If you will be using T-RACT, contact the permitting hotline for additional guidance.

### **5.2 Emissions Release Parameters**

Emissions release parameters (stack height, stack diameter, exit gas temperature at the point of release, and flow rate) have a large impact on model results. The protocol, or the submitted application, must thoroughly describe how release parameter values were measured or calculated. In most instances, parameters representing typical conditions should be used. Maximum stack temperatures and flow rates should not generally be used in the analyses.

The protocol should specify whether each modeled point source has an uninterrupted vertical release, a horizontal release, or vertical release with a rain cap. Typically, sources with horizontal releases or rain capped vertical releases should be modeled using an exit velocity of 0.001 meters/second to effectively eliminate momentum induced plume rise.

Emissions release parameters for any area and volume sources should also be thoroughly described and justified. Such parameters include the release height, initial horizontal dispersion coefficient, and initial vertical dispersion coefficient. If there is uncertainty on the proper calculation of these parameters, DEQ modeling staff should be consulted.

DEQ provided the following emission release parameter information that has been incorporated into the modeling analyses:

#### Aggregate Handling Emissions

For frontend loader aggregate transfers use AP42 Section 13.2.4, using a moisture content of 1.77 % for aggregate. DEQ modeled these sources using a base emissions calculated for a 10 mph windspeed. In the model emissions were varied according to wind speed. Using the default windspeed categories, the following emissions adjustment factors were used: Category 1 (upper wind speed of 1.54 m/sec) = 0.1014; Category 2 (upper wind speed of 3.09 m/sec) = 0.4253; Category 3 (upper wind speed of 5.14 m/sec) = 0.8974; Category 4 (upper wind speed of 8.23 m/sec) = 1.687; Category 5 (upper wind speed of 10.8 m/sec) = 2.669; Category 6 (upper wind speed of > 10.8 m/sec) = 3.768.

PM<sub>10</sub> emissions associated with the handling of aggregate materials were calculated using emissions factors from AP42 Section 13.2.4.

Emissions are calculated using the following emissions equation:

$$E = k(0.0032) \frac{\left(\frac{U}{5}\right)^{1.3}}{\left(\frac{M}{2}\right)^{1.4}} \text{ (pound [lb]/ton)}$$

Where:

k	=	0.35 for PM <sub>10</sub>
M	=	1.77% for aggregate as per Section 11.12
U	=	wind speed (mph)

In the model, emissions from these sources are varied as a function of windspeed.

upper windspeeds for 6 categories: 1.54, 3.09, 5.14, 8.23, 10.8 m/sec

Median windspeed for each category (1 m/sec = 2.237 mph)

Cat 1:	(0 + 1.54)/2 = 0.77 m/sec	➤ 1.72 mph
Cat 2:	(1.54 + 3.09)/2 = 2.32 m/sec	➤ 5.18 mph
Cat 3:	(3.09 + 5.14)/2 = 4.12 m/sec	➤ 9.20 mph
Cat 4:	(5.14 + 8.23)/2 = 6.69 m/sec	➤ 14.95 mph
Cat 5:	(8.23 + 10.8)/2 = 9.52 m/sec	➤ 21.28 mph
Cat 6:	(10.8 + 14)/2 = 12.4 m/sec	➤ 27.74 mph

#### Aggregate Handling

Base factor – use 10 mph wind:

Adjustment factors to put in the model:

$$\begin{aligned}\text{Cat 1: } & (1.72/5)^{1.3} (1.329 \text{ E-3}) = 3.319 \text{ E-4 lb/ton} \\ & \text{Factor} = 3.319 \text{ E-4} / 3.272 \text{ E-3} = 0.1014\end{aligned}$$

$$\begin{aligned}\text{Cat 2: } & (5.18/5)^{1.3} (1.329 \text{ E-3}) = 1.391 \text{ E-3 lb/ton} \\ & \text{Factor} = 1.391 \text{ E-3} / 3.272 \text{ E-3} = 0.4253\end{aligned}$$

$$\begin{aligned}\text{Cat 3: } & (9.20/5)^{1.3} (1.329 \text{ E-3}) = 2.936 \text{ E-3 lb/ton} \\ & \text{Factor} = 2.936 \text{ E-3} / 3.272 \text{ E-3} = 0.8974\end{aligned}$$

$$\begin{aligned}\text{Cat 4: } & (14.95/5)^{1.3} (1.329 \text{ E-3}) = 5.519 \text{ E-3 lb/ton} \\ & \text{Factor} = 5.519 \text{ E-3} / 3.272 \text{ E-3} = 1.687\end{aligned}$$

$$\begin{aligned}\text{Cat 5: } & (21.28/5)^{1.3} (1.329 \text{ E-3}) = 8.734 \text{ E-3 lb/ton} \\ & \text{Factor} = 8.734 \text{ E-3} / 3.272 \text{ E-3} = 2.669\end{aligned}$$

$$\begin{aligned}\text{Cat 6: } & (27.74/5)^{1.3} (1.329 \text{ E-3}) = 1.233 \text{ E-2 lb/ton} \\ & \text{Factor} = 1.233 \text{ E-2} / 3.272 \text{ E-3} = 3.768\end{aligned}$$

DEQ will allow a 75% control beyond that indicated by the emissions equation for reasonable controls. Very aggressive controls can be given an additional 95% control. These controls will likely require water sprays or other means to keep materials at a high moisture content.

#### **Truck unloading, scalping screen, and conveyors**

Emissions factors for conveyors, truck unloading, and the scalping screen should be calculated using emissions factors in AP42 Section 11.19.2.

#### **Oil heater**

Emissions for the oil heaters should be calculated from the factors for combustion of the fuel used for the heater (natural gas or oil).

#### **Modeling Parameters**

##### Asphalt Loadout

Assume loadout silo is 10 m high, 3 m wide, and emits at the midpoint

Initial dispersion coefficients:

$$\sigma_{y0} = 3 \text{ m} / 4.3 = 0.7 \text{ m}$$

$$\sigma_{z0} = 10 \text{ m} / 2.15 = 4.65 \text{ m}$$

##### Silo Filling

Assume silo is 10 m high, 3 m wide, and emits at 7.5 m

Initial dispersion coefficients:

$$\sigma_{y0} = 3 \text{ m} / 4.3 = 0.7 \text{ m}$$



$$\sigma_{z0} = 10 \text{ m} / 2.15 = 4.65 \text{ m}$$

Truck unloading, aggregate handlings, and conveyors

Model as volume source 30 m X 30m, 5 m high and emits at 2.5 m

Initial dispersion coefficients:

$$\sigma_{y0} = 30 \text{ m} / 4.3 = 7.0 \text{ m}$$

$$\sigma_{z0} = 5 \text{ m} / 4.3 = 1.2 \text{ m}$$

The application should provide clear documentation and verification of stack parameters (primarily flow rates and stack gas temperatures), clearly indicating how such values were estimated.

### **5.3 Elevation Data**

The source of data used to determine elevations of receptors, buildings, and emissions sources should be well documented. The same data source, or at least sources using the same datum, should be used for the entire analyses.

Typically digital elevation model (DEM) files are used to calculate elevations. Specific DEM files used in the analyses should be listed in the protocol if available.

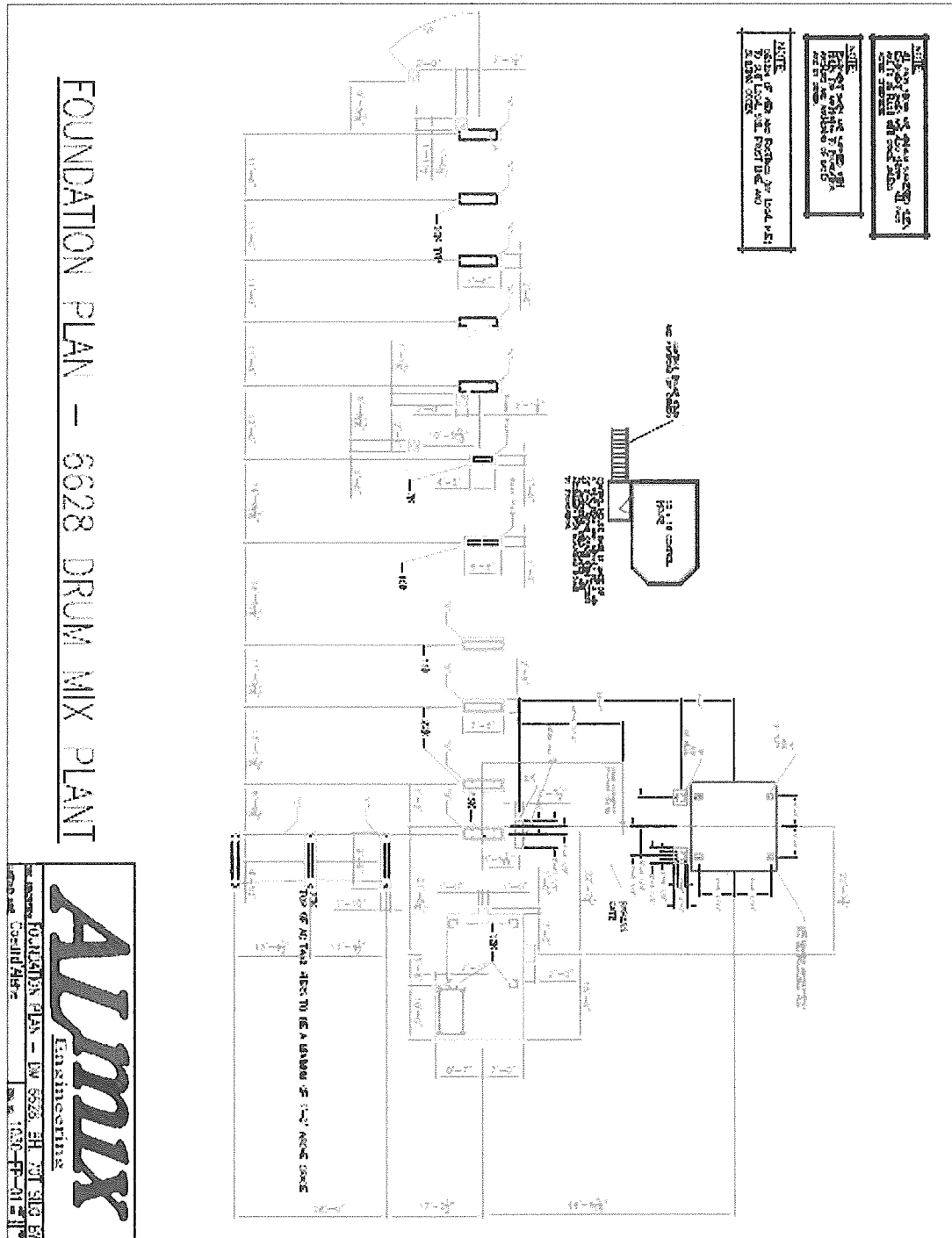
If the applicant proposes to run the models with the flat terrain option, thorough justification should be provided to demonstrate the area where maximum impacts are expected is effectively flat for dispersion modeling purposes. DEQ should be consulted if there is any uncertainty as to whether terrain effects should be considered.

No terrain effects were required by DEQ; however, a test run was done with particulate matter emissions assumed to be emitted 50 feet lower than the surrounding properties. This conservative check simulated areas of the gravel pit floor being below grade in some areas. No differences in modeled concentrations was found. Maximum impact areas in both "terrain" runs were in the northeast corner of the property where the terrain is level.

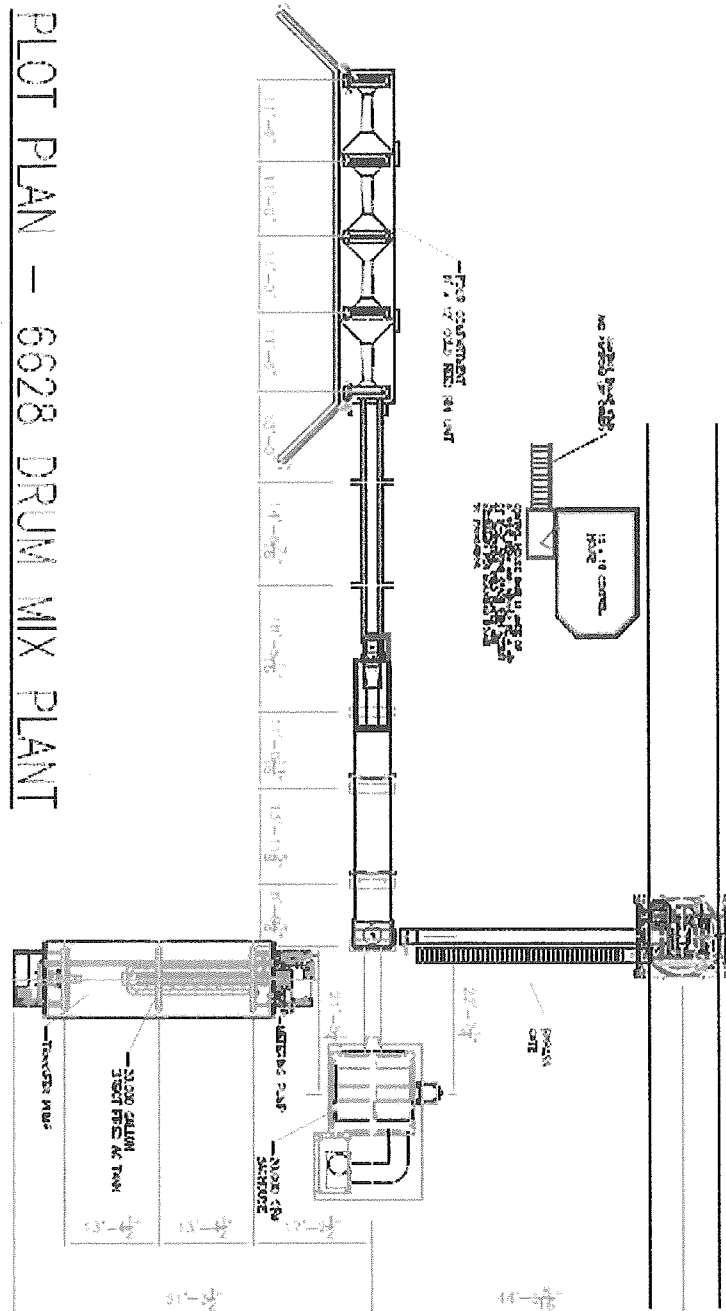
Appendix A – Aerial Photo of the Project Vicinity



# Appendix B – Elevation and Plot Plans



# PLOT PLAN - 6628 DRUM MIX PLANT



PLOT PLAN - 6628 DRUM MIX PLANT  
 1000-PP-01-11



**SECTION I.6**

**Previously Received  
DEQ Approval Letter for Modeling Protocol  
(Attached also)**



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 NORTH HILTON, BOISE, ID 83706 · (208) 373-0502

C. L. "BUTCH" OTTER, GOVERNOR  
TONI HARDESTY, DIRECTOR

May 28, 2008

Marie Piper  
Cascade Environmental Management  
Oak Harbor, Washington

RE: Modeling Protocol for the Proposed Coeur d'Alene Paving Hot Mix Asphalt Rathdrum Plant

Marie:

DEQ received your dispersion modeling protocol on May 21, 2008. The modeling protocol was submitted on behalf of Coeur d'Alene Paving Incorporated (CdA Paving). The modeling protocol proposes methods and data for use in the ambient impact analyses of a Permit to Construct application for a new portable asphalt plant, initially estimated to be located near Rathdrum, Idaho.

The modeling protocol has been reviewed and DEQ has the following comments:

- Comment 1: The application should provide documentation and justification for stack parameters used in the modeling analyses, clearly showing how stack gas temperatures and flow rates were estimated. In most instances, applicants should use typical parameters, not maximum temperatures and flow rates. For volume sources, the application should describe/show in detail how initial dispersion coefficients were calculated.
- Comment 2: The proposed receptor grid appears reasonable. However, it is the applicant's responsibility to use a sufficiently tight receptor network such that the maximum modeled concentration is reasonably resolved. If DEQ conducts verification modeling analyses with a tighter receptor grid and compliance with standards is no longer demonstrated, the permit will be denied.

The grid used supports location at the Rathdrum site, but does not support operation at other locations unless an approximate 400 meter setback is maintained (distance from the dryer stack to the southern boundary). If CdA Paving requests the modeling analyses be used to support relocation of the plant, a generic plant layout with a circular ambient air boundary should be used. The minimum set back distance will be determined by the maximum distance between the receptor that just meets NAAQS (next receptor out from the most distant receptor that shows an exceedance of the standard) and the most distant emissions point from that receptor. If no exceedances are modeled, the setback distance will be the maximum distance between the ambient air boundary and the most distant emissions point.

- Comment 3: Unless impacts of adjacent facilities are specifically modeled, the plant will be restricted from locating within 1000 feet of another HMA, concrete batch plant, and/or a rock crushing plant (a crushing plant that would be in addition to the one included in the submitted modeling analyses).
- Comment 4: Forms initially provided indicated impacts of total PAHs and POM exceeded AACCs for at least one of the modeling runs (using either Spokane or Sandpoint meteorological data). A permit cannot be issued unless compliance with all AACCs can be demonstrated. If concentrations are primarily driven by emissions from the asphalt silo filling and loadout operations, you may want to model these sources as a point source rather than a volume source. Please consult with DEQ modeling staff to determine point source release parameters that are appropriate for such sources.
- Comment 5: All emissions calculations for rates used in the model must be clearly shown such that values can be quickly regenerated by DEQ reviewers. Point source emissions are obtained through the spreadsheet provided by DEQ, but emissions for the crushing operations have not been documented. Also, make sure all calculated emissions are included in the modeling analyses unless specifically justified otherwise (for example - from the modeling files submitted, it appears that POM emissions were not modeled from the drum dryer).

DEQ's modeling staff considers the submitted dispersion modeling protocol, with resolution of the additional items noted above, to be approved. It should be noted, however, that the approval of this modeling protocol is not meant to imply approval of a completed dispersion modeling analysis. Please refer to the *State of Idaho Air Quality Modeling Guideline*, which is available on the Internet at [http://www.deq.state.id.us/air/permits\\_forms/permitting/modeling\\_guideline.pdf](http://www.deq.state.id.us/air/permits_forms/permitting/modeling_guideline.pdf), for further guidance.

To ensure a complete and timely review of the final analysis, our modeling staff requests that electronic copies of all modeling input and output files (including BPIP and AERMAP input and output files) are submitted with an analysis report. If DEQ provided model-ready meteorological data files, then these do not need to be resubmitted to DEQ with the application. If you have any further questions or comments, please contact me at (208) 373-0112.

Sincerely,

*Kevin Schilling*

Kevin Schilling  
Stationary Source Air Modeling Coordinator  
Idaho Department of Environmental Quality  
208 373-0112



## PhillWeist

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**From:** Marie Piper [cascade@pugetsound.net]  
**Sent:** Tuesday, June 17, 2008 10:14 PM  
**To:** Kevin.Schilling@deq.idaho.gov  
**Cc:** PhillWeist  
**Subject:** Modeling Protocol Follow-up for CdA Paving

Hi Kevin,

Thank you again for all of your assistance with this project. In preparing the permit application package, it was thought that a follow-up to your approval letter of our modeling protocol could be useful. In your approval letter you offered five comments and while we've discussed them already, I'll summarize our understandings here and will include this in the permit application package. Let me know if I've missed anything of consequence, if you would.

1. The stack parameters for the three point sources are from manufacturer/vendor supplied information - no refinements to the stack parameters were made. For the three point sources, the pollutants of primary concern are emitted at maximum quantities during maximum operations for which the stack parameters are presented. Carbon monoxide is a typical exception to this worst-case rule; however, the carbon monoxide impacts are far, far below the NAAQS whereby further modeling or changing of stack parameters wasn't warranted. The volume source parameters are based on scaled drawings provided by the manufacturer for the HMA plant and DEQ guidance. The crusher volume source parameters are based on DEQ guidance and best estimates, erring on the side of conservativeness.
2. The receptor grid and modeling is specific to the Rathdrum site. The receptor network follows DEQ guidance and is concentrated so that the maximum predicted impact is reasonably resolved. The primary purpose of this permit application is to obtain a permit to operate for operations at the Rathdrum site. However, as discussed, you may consider it reasonable to accept the modeling as portraying the HMA plant, without the crushing operations, as passing ambient air quality standards for other potential locations within the areas for which the Spokane meteorological data is deemed representative. We do not wish to hold up the permitting process for this potential situation; but, portability language could be included in the permit if you felt it was clearly supported by the existing modeling.
3. We modeled the crushing operations that we anticipate being conducted at the Rathdrum site. Any siting restrictions you deem necessary for the portability aspects of the HMA plant would be adhered to by Coeur d'Alene Paving.
4. TAPs compliance has been demonstrated with the modeling using Spokane meteorological data. The TAPs Compliance Demonstration Checklist is included in the permit application. A T-RACT demonstration, if it were required, would show no additional controls for TAPs are economically or reasonably available for the HMA plant however.
5. Emissions calculations were conducted using DEQ's HMA plant emissions spreadsheet with errors corrected and approved by DEQ as they were found. Further calculations were made and presented for the modeling input files. The emissions spreadsheet and calculations document is included in the permit application. POM emissions were included for all sources in the modeling this time and the emissions spreadsheet was revised to show those emissions for the sources that were missing previously.

Yesterday, I submitted the modeling input file and summary output files for your use. Please let me know if there is anything further I can provide, summarize, or clarify from our various conversations and workings together. Again, I appreciate your assistance and interaction on this project.

Best regards,

Marie

Marie E. Piper  
Principal Engineer

Cascade Environmental Management  
316 SE Pioneer Way, #294  
Oak Harbor, WA 98277

360.672.0088

[cascade@pugetsound.net](mailto:cascade@pugetsound.net)

## **SECTION II.1**

### **Pre-Permit Construction Eligibility and Proof of Eligibility**

See Form FRA

## **SECTION II.2**

### **Request to Construct Before Obtaining a Permit to Construct**

See Cover Letter

## **SECTION II.3**

### **Permit to Construct Application Forms**

- Form CS
- Form GI
- Form EU0
- Form EU1
- Form EU2
- Form HMAP
- Form BCE
- Forms EI-CP1 - EI-CP4
- PP (Plot Plan)
- Forms MI1 – MI4
- Form FRA



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# PERMIT TO CONSTRUCT APPLICATION

Revision 3  
 04/03/07

Please see instructions on page 2 before filling out the form.

COMPANY NAME, FACILITY NAME, AND FACILITY ID NUMBER			
1. Company Name	Coeur d'Alene Paving, Inc.		
2. Facility Name	Rathdrum plant	3. Facility ID No.	777-00432
4. Brief Project Description - One sentence or less	New asphalt production facility		
PERMIT APPLICATION TYPE			
5. <input checked="" type="checkbox"/> New Facility <input type="checkbox"/> New Source at Existing Facility <input type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Modify Existing Source: Permit No.: _____ Date Issued: _____ <input type="checkbox"/> Required by Enforcement Action: Case No.: _____			
6. <input checked="" type="checkbox"/> Minor PTC <input type="checkbox"/> Major PTC			
FORMS INCLUDED			
Included	N/A	Forms	DEQ Verify
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form GI – Facility Information	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form EU0 – Emissions Units General	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form EU1 - Industrial Engine Information Please Specify number of forms attached: _____	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form EU2 - Nonmetallic Mineral Processing Plants Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU3 - Spray Paint Booth Information Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU4 - Cooling Tower Information Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form EU5 – Boiler Information Please Specify number of forms attached: _____	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form HMAP – Hot Mix Asphalt Plant Please Specify number of forms attached: _____	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form CBP - Concrete Batch Plant Please Specify number of forms attached: _____	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form BCE - Baghouses Control Equipment	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Form SCE - Scrubbers Control Equipment	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Forms EI-CP1 - EI-CP4 - Emissions Inventory-- criteria pollutants (Excel workbook, all 4 worksheets)	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	PP – Plot Plan	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Forms MI1 – MI4 – Modeling (Excel workbook, all 4 worksheets)	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Form FRA – Federal Regulation Applicability	<input type="checkbox"/>

DEQ USE ONLY	
Date Received	
Project Number	
Payment / Fees Included? Yes <input type="checkbox"/> No <input type="checkbox"/>	
Check Number	





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# PERMIT TO CONSTRUCT APPLICATION

Revision 3  
 03/26/07

Please see instructions on page 2 before filling out the form.

**All information is required. If information is missing, the application will not be processed.**

## IDENTIFICATION

1. Company Name	Coeur d'Alene Paving, Inc.
2. Facility Name (if different than #1)	Rathdrum plant
3. Facility I.D. No.	777-00432
4. Brief Project Description:	New asphalt production facility

## FACILITY INFORMATION

5. Owned/operated by: (√ if applicable)	<input type="checkbox"/> Federal government <input type="checkbox"/> County government <input type="checkbox"/> State government <input type="checkbox"/> City government
6. Primary Facility Permit Contact Person/Title	Phill Weist, Safety Manager
7. Telephone Number and Email Address	208-762-0235    phillw@cdapaving.com
8. Alternate Facility Contact Person/Title	Craig Cozad, President
9. Telephone Number and Email Address	208-691-4241    craigc@cdapaving.com
10. Address to which permit should be sent	E. 120 Anton Ave.
11. City/State/Zip	Coeur d'Alene, ID 83815
12. Equipment Location Address (if different than #10)	2492 W. Highway 53
13. City/State/Zip	Rathdrum, ID 83858
14. Is the Equipment Portable?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
15. SIC Code(s) and NAISC Code	Primary SIC: 1611    Secondary SIC (if any):    NAICS: 238990
16. Brief Business Description and Principal Product	Asphalt paving contractor
17. Identify any adjacent or contiguous facility that this company owns and/or operates	Twenty adjacent acres zoned mining

## PERMIT APPLICATION TYPE

18. Specify Reason for Application	<input checked="" type="checkbox"/> New Facility <input type="checkbox"/> New Source at Existing Facility <input type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Modify Existing Source: Permit No.: _____ Date Issued: _____ <input type="checkbox"/> Permit Revision <input type="checkbox"/> Required by Enforcement Action: Case No.: _____
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## CERTIFICATION

IN ACCORDANCE WITH IDAPA 58.01.01.123 (RULES FOR THE CONTROL OF AIR POLLUTION IN IDAHO), I CERTIFY BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION IN THE DOCUMENT ARE TRUE, ACCURATE, AND COMPLETE.

19. Responsible Official's Name/Title	Craig Cozad, President
20. RESPONSIBLE OFFICIAL SIGNATURE	Date: 6-18-08
21. <input checked="" type="checkbox"/> Check here to indicate you would like to review a draft permit prior to final issuance.	



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Emissions Unit - General **Form EU0**

# PERMIT TO CONSTRUCT APPLICATION

Revision 3  
03/27/07

Please see instructions on page 2 before filling out the form.

## IDENTIFICATION

Company Name: Coeur d'Alene Paving, Inc.	Facility Name: Rathdrum plant	Facility ID No: 777-00432
Brief Project Description:	New asphalt production facility	

## EMISSIONS UNIT (PROCESS) IDENTIFICATION & DESCRIPTION

1. Emissions Unit (EU) Name:	ALMIX PLANT		
2. EU ID Number:	P1		
3. EU Type:	<input checked="" type="checkbox"/> New Source <input type="checkbox"/> Unpermitted Existing Source <input type="checkbox"/> Modification to a Permitted Source -- Previous Permit #:    Date Issued:		
4. Manufacturer:	ALMIX		
5. Model:	6628		
6. Maximum Capacity:	150 TON/HOUR		
7. Date of Construction:	MAY 2008		
8. Date of Modification (if any)	N/A		
9. Is this a Controlled Emission Unit?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes    If Yes, complete the following section. If No, go to line 18.		

## EMISSIONS CONTROL EQUIPMENT

10. Control Equipment Name and ID:	Baghouse BH1		
11. Date of Installation:	May 2008	12. Date of Modification (if any):	N/A
13. Manufacturer and Model Number:	ALMIX 20,000CFM		
14. ID(s) of Emission Unit Controlled:	P1		
15. Is operating schedule different than emission units(s) involved?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
16. Does the manufacturer guarantee the control efficiency of the control equipment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No    (If Yes, attach and label manufacturer guarantee)		

Control Efficiency	Pollutant Controlled					
	PM	PM10	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
	%	%	%	%	%	%

17. If manufacturer's data is not available, attach a separate sheet of paper to provide the control equipment design specifications and performance data to support the above mentioned control efficiency.

## EMISSION UNIT OPERATING SCHEDULE (hours/day, hours/year, or other)

18. Actual Operation	150 TON/HOUR; 2000 HRS/YEAR
19. Maximum Operation	150 TON/HOUR; 24 HRS/DAY

## REQUESTED LIMITS

20. Are you requesting any permit limits?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No    (If Yes, check all that apply below)
<input checked="" type="checkbox"/> Operation Hour Limit(s):	2000 HRS/YEAR HMA PLANT; 4800 HRS/YEAR HOT OIL TANK; 12 HRS/DAY CRUSHER
<input type="checkbox"/> Production Limit(s):	
<input type="checkbox"/> Material Usage Limit(s):	
<input type="checkbox"/> Limits Based on Stack Testing	Please attach all relevant stack testing summary reports
<input type="checkbox"/> Other:	
21. Rationale for Requesting the Limit(s):	Anticipated HMAP max. yearly operations and max. daily crushing operations



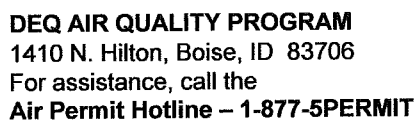
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Emissions Units - Industrial Engine Information **Form EU1**  
**PERMIT TO CONSTRUCT APPLICATION**

Revision 3  
03/27/07

Please see instructions on page 2 before filling out the form.

IDENTIFICATION				
Company Name: Coeur d'Alene Paving, Inc.		Facility Name: Rathdrum plant		Facility ID No: 777-00432
Brief Project Description:		New asphalt production facility		
EXEMPTION				
Please refer to IDAPA 58.01.01.222.01.c and d for a list of internal combustion engines that are exempt from the Permit to Construct requirements.				
ENGINE (EMISSION UNIT) DESCRIPTION AND SPECIFICATIONS				
1. Type of Unit: <input type="checkbox"/> New Unit <input checked="" type="checkbox"/> Unpermitted Existing Unit <input type="checkbox"/> Modification to a Unit with Permit #:PBR Date Issued: 9-08-03				
2. Use of Engine: <input type="checkbox"/> Normal Operation <input type="checkbox"/> Emergency <input type="checkbox"/> Back-up <input checked="" type="checkbox"/> Other: Temporary crusher				
3. Engine ID Number: CI Gen		4. Rated Power: <input type="checkbox"/> Brake Horsepower(bhp) <input checked="" type="checkbox"/> 725 Kilowatts(kW)		
5. Construction Date: March 22, 2002		6. Manufacturer: Caterpillar		7. Model: 3412
8. Date of Modification (if applicable): March 22, 2002		9. Serial Number (if available): 2WJ02045		10. Control Device (if any): ultra low sulfur fuel
FUEL DESCRIPTION AND SPECIFICATIONS				
11. Fuel Type	<input checked="" type="checkbox"/> Diesel Fuel (#2) (gal/hr)	<input type="checkbox"/> Gasoline Fuel (gal/hr)	<input type="checkbox"/> Natural Gas (cf/hr)	<input type="checkbox"/> Other Fuels (unit: )
12. Full Load Consumption Rate	36			
13. Actual Consumption Rate	20			
14. Sulfur Content wt%	.05	N/A	N/A	
OPERATING LIMITS & SCHEDULE				
15. Imposed Operating Limits (hours/year, or gallons fuel/year, etc.): 600 hrs./year				
16. Operating Schedule (hours/day, months/year, etc.): 12hrs/day max.				



# PERMIT TO CONSTRUCT APPLICATION

Revision 3  
03/27/07

**This form requests information about equipment at a nonmetallic mineral processing plant, as defined in 40 CFR 60.671, that generates fugitive emissions only.**

**In addition, Form EU0 and appropriate control equipment forms should be used for each stack emission point from the same plant.**

IDENTIFICATION					
Company Name:		Facility Name:			Facility ID No:
Wood's Crushing & Hauling, Inc.		Wood's Plant #1			
Brief Project Description:		Temporary Crusher			
EQUIPMENT (EMISSION UNIT) DESCRIPTION AND SPECIFICATIONS					
1. Equipment Description	2. Construction Date	3. Serial Number	4. Equipment ID Number (company's)	5. Rated Capacity	6. Emission Control Type
Nordberg jaw	1998	2372	CI 34 x 44	750 tph	water spray
JCI screen	2003	5031137	JCI 6 x 20	120 scpt	water spray
JCI cone	2003	0030187	JCI 1400 ls	750 tph	water spray
Cedarapids screen	1999	48101	Cedarapids 6 x 20	120 sq.ft.	water spray
MVP 380 cone	1999	380-48101	MVP 380	750 tph	water spray
Pioneer Rolls	1950	FSH-42903	Pioneer Rolls	200 tph	water spray
Caterpillar Generator	1999	2WJ02045	CI Gen	725 kw	ultra low sulfur fuel
OPERATING SCHEDULE (hours/day, or hours/week, or months/year, or other)					
7. Actual Operation	12 hrs day max.				
8. Maximum Operation	600 hrs/year				



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Hot Mix Asphalt Plant **Form HMAP**

## PERMIT TO CONSTRUCT APPLICATION

Revision 3  
04/02/07

Please see instructions on page 4 before filling out the form.

### GENERAL INFORMATION

Company Name:	Coeur d'Alene Paving, Inc.		
Facility Name:	Rathdrum	Facility ID No:	777-00432
Brief Project Description:	New asphalt production facility		
Mailing Address:	E. 120 Anton Ave.		
City:	Coeur d'Alene	State:	ID
Zip Code:	83815	County:	Kootenai
General Nature of Business & Products:	Asphalt paving contractor		

Contact Name, Title:	Phill Weist, Safety Manager		
Phone:	208-762-0235	Cell:	208-661-3272
Email:	phillw@cdapaving.com		

Owner or Responsible Official Name, Title:	Craig Cozad, President		
Phone:	208-691-4241		
Email:	craigc@cdapaving.com		

Proposed Initial Plant Location:	2492 W. Hwy 53 Rathdrum, ID		
Nearest City:	Rathdrum, ID	Estimated Startup Date:	July 17, 2008
County:	Kootenai		

Reason for Application:	<input checked="" type="checkbox"/> Permit to construct a new source <input type="checkbox"/> Permit to operate an existing unpermitted source <input type="checkbox"/> Permit to modify/revise an existing permitted source (identify the permit below) Permit No.: _____ Issue Date: _____ Facility ID: _____
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☒ Check here to indicate you would like to review a draft permit prior to final issuance.

Comments:

**HOT-MIX ASPHALT PLANT INFORMATION**

<b>Manufacturer:</b>	ALMix	<b>Model:</b>	6628
<b>Manufacture Date:</b>	May 2008	<b>Type HMA Plant:</b>	<input checked="" type="checkbox"/> Drum Mix <input type="checkbox"/> Batch Mix
<b>Maximum Hourly Asphalt Production:</b>	150tons/hour (tons/hour)		
<b>Requested Annual Asphalt Production:</b>	300,000 tons/year (tons/year)		
<b>Burner Fuel Type:</b>	Natural gas (natural gas, #2 fuel oil, used oil, etc.)		
<b>Maximum Burner Fuel Usage Rate:</b>	44,407 <input checked="" type="checkbox"/> scf/hour or <input type="checkbox"/> gallons/hour		
<b>Type Air Pollution Control Device:</b>	baghouse (baghouse, scrubber, etc.)		
<b>Control Device Manufacturer:</b>	ALMix	<b>Model:</b>	20,000 CFM
<b>Stack Parameters:</b>	Stack Height from Ground (ft): <u>36.36</u> Stack Exhaust Flow Rate (acfm): <u>24,867</u> Stack Inside Diameter (ft): <u>2'-7 1/4"</u> Stack Exhaust Gas Temperature (°F): <u>275</u>		

**ASPHALT TANK HEATER**

<b>Fuel Type:</b>	Direct fired natural gas (natural gas, #2 fuel oil, used oil, etc.)		
<b>Maximum Fuel Usage Rate:</b>	BTU/HR (units/hour) (units/year) <input type="checkbox"/> gallons <input type="checkbox"/> ft <sup>3</sup> <input type="checkbox"/> other:		
<b>Type Air Pollution Control Device:</b>	0.7 <input checked="" type="checkbox"/> MMBtu <input type="checkbox"/> HP		
<b>Stack Parameters:</b>	Stack Height from Ground (ft): <u>11.71</u> Stack Exhaust Flow Rate (acfm): <u>370</u> Stack Inside Diameter (ft): <u>0.67</u> Stack Exhaust Gas Temperature (°F): <u>650</u>		

Is this an NSPS-affected facility? ☒ Yes ☐ No

To determine if the HMA facility is a New Source Performance Standards (NSPS)-affected facility, consider the following:

Were any of the following constructed or modified after June 11, 1973, such that the equipment becomes an affected facility as defined in 40 Code of Federal Regulations, Part 60, Section 90 (40 CFR 60.90) *Standards of Performance for Hot-Mix Asphalt Facilities*:

- Dryers
- Systems for screening, handling, storing, and weighing of hot aggregate
- Systems for loading, transferring, and storing of mineral filler
- Systems for mixing hot-mix asphalt
- Leading, transfer, and storage systems associated with emission control systems

Modification is defined in 40 CFR 60.14. The Code of Federal Regulations can be accessed from the website <http://www.gpoaccess.gov/cfr/>.

**Has a performance test been conducted in accordance with 40 CFR 60.93 that demonstrates particulate matter emissions are less than or equal to 0.04 gr/dscf (grains per dry standard cubic foot) at the HMA stack?**

☐ Yes ☒ No

If Yes, state the date the test was conducted: \_\_\_\_\_.

Provide a copy of the performance test results with this application if you want DEQ to consider it in determining the frequency of performance testing requirements for your hot-mix asphalt plant.

**ELECTRICAL GENERATOR SET INFORMATION (If Applicable)**

<b>Manufacturer:</b>	See EU1	<b>Model:</b>	3412
<b>Maximum Rated Capacity:</b>	725	<input type="checkbox"/> Hp	<input checked="" type="checkbox"/> kW
<b>Fuel Type:</b>	<input type="checkbox"/> Gasoline	<input checked="" type="checkbox"/> Diesel	<input type="checkbox"/> Natural Gas <input type="checkbox"/> Propane
<b>Maximum Fuel Usage Rate:</b>	50 (max.)	<input checked="" type="checkbox"/> gal./hr.	<input type="checkbox"/> cfh (per emission spreadsheet AP-42)
<b>Maximum Daily Hrs. of Operations:</b>	12 (hours/day)		
<b>Maximum Annual Hrs. of Operations:</b>	600 (hours/year)		
<b>Stack Parameters:</b>	Stack Height from Ground (ft): 14	Stack Exhaust Flow Rate (acfm):	4061
	Stack Inside Diameter (ft): 0.66	Stack Exhaust Gas Temperature (°F):	1131

<b>Manufacturer:</b>		<b>Model:</b>	
<b>Maximum Rated Capacity:</b>		<input type="checkbox"/> Hp	<input type="checkbox"/> kW
<b>Fuel Type:</b>	<input type="checkbox"/> Gasoline	<input type="checkbox"/> Diesel	<input type="checkbox"/> Natural Gas <input type="checkbox"/> Propane
<b>Maximum Fuel Usage Rate:</b>		<input type="checkbox"/> gal./hr.	<input type="checkbox"/> cfh
<b>Maximum Daily Hrs. of Operations:</b>	(hours/day)		
<b>Maximum Annual Hrs. of Operations:</b>	(hours/year)		
<b>Stack Parameters:</b>	Stack Height from Ground (ft): _____	Stack Exhaust Flow Rate (acfm):	_____
	Stack Inside Diameter (ft): _____	Stack Exhaust Gas Temperature (°F):	_____

☒ \$1,000 PTC application fee enclosed

**Certification of Truth, Accuracy, and Completeness (by Responsible Official)**

I hereby certify that based on information and belief formed after reasonable inquiry, the statements and information contained in this and any attached and/or referenced document(s) are true, accurate, and complete in accordance with IDAPA 58.01.01.123-124.



Responsible Official Signature

President

Responsible Official Title

6-18-08

Date

Craig Cozad

Print or Type Responsible Official Name



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# PERMIT TO CONSTRUCT APPLICATION

Revision  
04/02/0

*Please see instructions on page 2 before filling out the form.*

[illegible]